

September 21, 2010

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Petition for Rulemaking Regarding the Transition of Part 22 Cellular Services to
Geographic Market-Area Licensing (RM-11510)

Dear Ms. Dortch:

Since the initial comment cycle in this proceeding, CTIA – The Wireless Association® (“CTIA”) has worked with various stakeholders, including large and small carriers, to formulate a compromise proposal for transitioning the cellular radiotelephone service (“cellular”) to a market-based licensing system. The attached outline reflects the results of these efforts. Most importantly, the revised plan draws a distinction between fully-served and under-served markets, extending the benefits of market-based licensing to the former, while preserving the Commission’s unserved area rules in the latter. Indeed, as reformulated, the revised plan anticipates that the Commission’s unserved area rules could continue unchanged, indefinitely, in sparsely populated/underserved markets.

CTIA submits that the attached proposal, which takes into account the objectives and concerns raised by commenters in this proceeding, offers a reasonable compromise that will improve the efficiency and efficacy of the Commission’s cellular licensing processes. Accordingly, CTIA urges the Commission to take prompt action in this matter consistent with the revised plan described in the attached.

Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ *David J. Redl*

David J. Redl

Attachment

cc: Renée Crittendon
Roger Noel
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